

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CHRISTOPHER KING, J.D. A/K/A  
KINGCAST, and JOHN NOVAK,

Plaintiffs,

v.

LIQUOR AND CANNABIS BOARD OF  
THE STATE OF WASHINGTON; JANE  
RUSHFORD, Chair of the Liquor and  
Cannabis Board; RICK GARZA, Director  
of the Liquor and Cannabis Board; JAY  
INSLEE, Governor of Washington;  
ROBERT FERGUSON, Washington  
Attorney General; WILLIAM P. BARR,  
U. S. Attorney General; AND OFFICE OF  
NATIONAL DRUG CONTROL POLICY

In their Individual and Official Capacities,

Defendants.

No. 2:20-CV-01494-RAJ

DECLARATION OF  
JONATHAN E. PITEL IN  
SUPPORT OF  
DEFENDANTS' RESPONSE  
TO PLAINTIFFS' REQUEST  
FOR PERMISSIVE JOINDER

1. I am an Assistant Attorney General in the Licensing and Administrative Law Division of the Office of the Attorney General. In that capacity, I represent Governor Jay Inslee; Attorney General Robert Ferguson; the Liquor and Cannabis Board of the State of Washington; Jane Rushford, former Chair of the Liquor and Cannabis Board; and Rick Garza, Director of the

1 Liquor and Cannabis Board (State Defendants) in the above captioned case. I am at least 18 years  
2 of age, competent to testify as a witness, and have personal knowledge of the facts related in this  
3 declaration.

4 2. I make this declaration on the basis of my personal knowledge.

5 3. On August 18, 2021, I received an email from Christopher King, entitled "Cynjo  
6 Raylene Hall Dismissal." A redacted copy of that email is attached hereto as **Exhibit A**. The  
7 Exhibit has been redacted only to protect the email addresses of non-parties.

8 4. I declare under penalty of perjury under the laws of the State of Washington that  
9 the foregoing is true and correct.  
10

11  
12 DATED this 26<sup>th</sup> day of August, 2021.  
13

14  
15 ROBERT W. FERGUSON  
16 ATTORNEY GENERAL

17 s/ Jonathan E. Pitel  
18 JONATHAN E. PITEL, WSBA # 47516  
19 *Assistant Attorney General*  
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26

Counsel for State Defendants

# **EXHIBIT A**

**From:** [Christopher King](#)  
**To:** Pitel, Jonathan E. (ATG); Carr, Michelle A. (ATG)

**Cc:**

**Subject:** Cynjo Raylene Hall Dismissal  
**Date:** Wednesday, August 18, 2021 9:19:18 AM

[EXTERNAL]

Dismissed without Prejudice though which is bullshit. Same thing the state did to me in NH -- like a Nol-Pross Nolle Prosequi in which they still technically reserve the right to come back and try to wreck your life. I should have known this was the slimy route they would take. Same with Levi. Does wonders for their insurance metrics. I know, remember I've practiced on both sides.

And this way a Jury doesn't get to hear Agent John Jung get grilled, get it? I'm still sharing this comment and development with the Federal Court today you bet. Right after Breakfast.

Ciao.

C

EXHIBIT A

